

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

TOWN OF IPSWICH,

Plaintiff,

**V.**

NATIONAL UNION FIRE INSURANCE COMPANY  
OF PITTSBURGH, PA,

**Defendant.**

CIVIL ACTION  
NO. 05-11114-MLW

**JOINT MOTION TO EXTEND TIME TO REOPEN CASE**

Plaintiff Town of Ipswich and Defendant National Union Fire Insurance Company of Pittsburgh, PA (collectively the “Parties”) hereby jointly move the Court to extend by 30 days, i.e., until May 3, 2006, the time by which the Parties may reopen the case. In support of this Motion, the parties state as follows:

1. On or about January 25, 2006, counsel for Plaintiff informed the Court that the Parties had reached agreement with respect to a settlement figure and were in the process of documenting the settlement.

2. On February 3, 2006, the Court entered a “Settlement Order of Dismissal”, ordering that the case be dismissed “without prejudice to the right of any party, upon good cause shown, to reopen the action within thirty (30) days if settlement is not consummated.”

3. On February 28, 2006, the Court allowed a Joint Motion by the Parties to extend until April 3, 2006 the time by which the Parties have to reopen the case.

4. The Parties have been working diligently, but have not yet completed their negotiations over the non-monetary terms of the Settlement Agreement, specifically the language of the mutual releases that are contained within the Settlement Agreement. The Parties anticipate that they may not be able to complete their negotiations and have the Agreement signed by April 3, 2006.

5. The delay in completing the negotiations is attributable in part to the fact that because the Defendant is a municipal corporation there are multiple levels of review and approval before any settlement can be finalized.

6. Accordingly, the Parties jointly request that the time by which the Parties have to reopen the case be extended by 30 days, until May 3, 2006.

WHEREFORE the Parties jointly request that the Court enter an Order extending until May 3, 2006 the time by which the Parties may reopen the case.

Respectfully submitted,

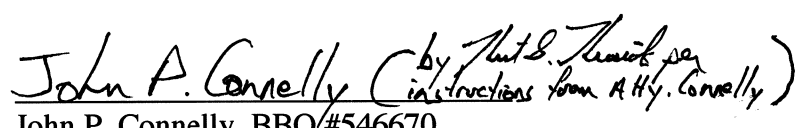
TOWN OF IPSWICH

NATIONAL UNION FIRE INSURANCE  
COMPANY OF PITTSBURGH, PA

By its attorneys,

By its attorney,

  
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Dated: March 29, 2006